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Attorneys for Defendant NIKE, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of others
similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-JR

DECLARATION OF
CHESTER HANVEY, Ph.D.

[REDACTED VERSION]

DECLARATION OF CHESTER HANVEY, Ph.D.

I, Chester Hanvey, Ph.D., hereby declare as follows:

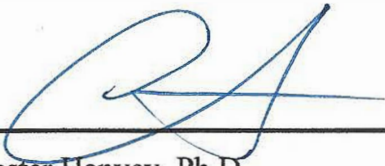
1. I am over the age of eighteen and have personal knowledge of the matters set forth in this declaration. I am competent to testify to such matters at a hearing or trial if necessary, and I am authorized to make this declaration.

2. I am a Director in the Labor and Employment Practice at Berkley Research Group, LLC, a global strategic advisory and expert consulting firm. I am an expert in Industrial/Organization (I/O) psychology and have extensive experience designing and executing job analyses.

3. I have been retained by counsel for Defendant Nike, Inc. as an expert in I/O psychology to analyze jobs performed by Nike employees and provide an opinion on the degree of variability in the work performed and the skill, effort, responsibility, and working conditions associated with their jobs. In addition, I was asked to review the July 15, 2021 report submitted by Dr. Kathleen K. Lundquist, which was submitted in support of Plaintiff's Motion for Class Certification, and provide an opinion on the scientific soundness of the methods employed and the conclusions reached in that report.

4. Attached hereto as Exhibit A is a true and correct copy of my expert report in this matter, dated October 1, 2021. I incorporate the contents of my report into this declaration as if fully set forth herein and will testify to the matters set forth in my report at trial or any other court proceeding.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 and the laws of the United States of America that the foregoing is true and correct. Executed on this 21st day of March, 2022, in San Diego, California.



Chester Hanvey, Ph.D.